Storm Water Pollution Prevention Plan (SWPPP) – Projected Plan Revision & Annual Incremental Implementation Costs

	Total	\$28,175.00
	1 @ 40 hrs. ea. X 3 individuals X \$75.00 p/hr. Map Graphics	\$9,000.00 \$800.00
8.	SWPPP Revision	
	1 @ 2 hrs. ea. X 1 Individual X \$75.00 p/hr.	\$150.00
7.	SWPPP Quality Assurance & Control	
	1 @ 8 hrs. ea. X 1 individual X \$75.00 p/hr.	\$600.00
6.	SWPPP Annual Site Compliance Audit	
	4 @ 4 hrs. ea. X 2 Individuals X \$75.00 p/hr.	\$2,400.00
5.	SWPPP Quarterly Preventive Maintenance Inspections	
	12 @ 2 hrs. ea. X \$75.00 p/hr.	\$1,800.00
4.	SWPPP Monthly Storm Water Discharge Observations	
	4 @ 4 hrs. ea. X \$75.00 p/hr.	\$1,200.00
3.	SWPPP Non-Storm Water Observations - Based on quarterly observations	
	Based on 3 storm events for supplies, sample collection, Lab analysis & reporting, and management costs	\$3,625.00
2.	SWPPP Storm Water Sampling & Tracking	
	SWPPP Team – 6 Individuals @ \$300.00 ea. General Employee Training – 34 @ \$200.00 ea.	\$1,800.00 \$6,800.00
1.	SWPPP Annual Training	

Storm Water Pollution Prevention Plan & Monitoring Program

* * * * *

TraPac, Inc. Wilmington, CA

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APPENDIX

Facility Map w/Drain Locator & Flow Directional

REPORTING & BLANKFORMS

- SWPP Annual Training Documentation
- Storm Water Sampling QA/QC Checklist
- Storm Water Sample Tracking
- Non-Storm Water Drainage & Visual Observation Record
- Monthly Storm Water Discharge Visual Observation Record
- Quarterly Preventive Maintenance & Equipment Inspection Report
- Annual Site Compliance Audit
- Quality Assurance & Control Checklist

1.0 INTRODUCTION

1.1 General

The Storm Water Pollution Prevention Plan (SWPPP) has two major objectives.

- 1. Identify and evaluate sources of pollution that may affect the quality of storm water discharges and authorized non-storm water discharges from the facility.
- 2. Identify and implement the Best Management Practices (BMP) to prevent and reduce pollutants in storm water discharges and authorized non-storm water discharges.

The BMP's include address to administration, materials handling, and management measures, as well as, hazardous waste/materials pollution prevention, and other engineered measures.

The Storm Water Pollution Prevention Plan (SWPPP) also contains implementation schedules; description of industrial activities and pollutant sources; BMP details; maps and drawings; and copies of other plans relevant to the SWPPP. The SWPPP will be revised whenever appropriate and remain on site and readily available for review by those of needed interest and/or authority.

1.2 Facility Particulars

Company Name: TraPac, Inc.

Port of Los Angeles Facility ID Number: 4 19S000868

Port Facility Address: 920 W. Harry Bridges Blvd., Wilmington, CA 90744

Telephone No: (310) 830-2000

Types of Industrial Activities at Facility: TraPac is a container ship berthing and terminal facility engaged in the loading and discharging of ocean going vessels, along with facilitating the inland carriage distribution of intermodal containers.

Standard Industrial Classification Code(s): 4231

Area of Property (Acres or Square Feet): Approximately 170 Acres

Approximate Percent of Area which is Impervious (buildings and pavement): 1 Acre

Name of Responsible Person: Frank Pisano, Vice President

Facility Contact: Paul Richey, Manager LPCS

Facility Description

FraPac is a container ship facility utilizing the Port of Los Angeles Berths 136 thru 147 and adjacent backland storage areas at 920 West Harry Bridges Boulevard, Wilmington, California.

The main terminal yard facility currently measures approximately 170 acres and is designed to accommodate intermodal container storage for both highway ready and stacked storage, along with providing containe truck loading and distribution to highway of common carriers. The container storage area will house approximately 10,000 units depending on size and type of storage.

The terminal facility contains four office buildings for housing employees, of which one building is also used for select maintenance and repair of intermodal containers and yard equipment. The facility surface is blacktop and concrete covered, with minor areas of garden and foliage strips.

The vessel berth frontage for berths 136 through 139 face Southward and extends for 1,775 feet, with Berth 135 adjoining, but not used by TraPac. Additional berths 144 through 147 face North, with the highline extending 2,000 feet. The facility backland is bordered to the West by the neighboring Yang Ming terminal, and to the North by Harry Bridges Boulevard. The East and Southeast borders are formed by Neptune Street and the neighboring Pacific Harbor Line rail terminal facility.

The main entrance is located at the intersection of Figeruoa Street and Harry Bridges Boulevard, with additional access at Water Street and "A" Street.

(Refer to facility map for yard configuration and building locations.)

1.3 Site Hydrology

The rainfall in the Los Angeles port area is characterized as variable annually and seasonably. Although following a changeable pattern, the rainy and dry seasons are fairly constant, with the rainy season typically extending from November through April. During this period, the major percentage of rainfall occurs. There is the potential each month of either more or less rainfall than the yearly average. The known average in this areas is said to be approximately 12 inches.

1.4 Site Drainage

Facility drawings indicate that storm water runoff at the terminal is collected by a series of catch basins and slotted drains. These collectors flow into a series of storm drains which discharge into the Los Angeles Harbor through various separate outfalls. The outfalls are located under the wharf facing North for the B-142 to B147 area, and facing South for the outfalls between B-136 and B-139. The drains leading to the outfalls are connected in a series with the ground drains, which all deposit into the bay. See the facility map enclosed.

2.0 STORM WATER POLLUTION PREVENTION TEAM

The TraPac Storm Water Pollution Prevention Team is composed of the following individuals who are based the terminal facility, and who are knowledgeable regarding terminal operations. They are responsible for sisting adherence to the SWPPP, and will participate as advisors and implementers of improved prevention methods.

The named team members are:

Paul Richey, Manager LPCS Stacey Collette, M&R Manager Holly Lewandowski, M&R Manager Robert Avelar, M&R Manager

The SWPPP team are responsible for the following activities:

- a. Ensuring the development of the SWPPP
- b. Reviewing and revising the SWPPP
- c. Ensuring proper implementation of the SWPPP, including performing and/or overseeing the required sampling, periodic observations, and inspections.
- d. Assisting in coordinating and effecting SWPPP training for facility personnel.
- e. Maintaining advisory to management regarding SWPPP requirements and program effectiveness.

3.0 LIST OF SIGNIFICANT MATERIALS AND CHEMICALS

3.1 List of Materials and Chemicals

Based upon a review of TraPac's operations and chemicals, a list of significant materials and chemicals is contained in Table 1.

Table 1 - Significant Materials On-Site

MATERIAL	LOCATION	APPROX. QUANTITY	HANDLING AREAS	RECEIVING/ SHIPPING AREAS	DELIVERY FREQUENCY
Diesel fuel	North of the Maintenance building	1 X 12,000 gal. below ground double wall tank w/monitoring system 1 x 2,000 & 1 x 5,000 gal. mobile fuel truck	Diesel/Gasoline refueling island; Mobile fuel trucks	Diesel refueling island; North of the Maintenance building outside	Bi-Weekly
Gasoline	North of the Maintenance building	500 gallon above ground single wall tank w/containment tub	Gasoline/Diesel refueling island	Gasoline/Diesel refueling island	Bi-Monthly
Antifreeze	East end of Maintenance building	300 gallon above ground tank with secondary support w/spill pallet	Maintenance building	Maintenance building	Monthly
Oil, Lubricants and Automatic Insmission ds (ATF)	East end of the Maintenance building	220gal.Hydraulic & Gear Oil & 110 gallon ATF, above ground tanks with containment. 55	Maintenance building	Maintenance building	Weekly to Bi- Monthly

		gallon drum of grease			
Motor oil	East end of Maintenance building	550 gal. under ground double walled tank w/monitoring system	Maintenance building at tank	Maintenance building at tank	Bi-Monthly
Waste oil and drained oil filters	1		1,000 gal. below ground double wall tank w/monitoring system & 55 gal. drums on spill pallet		Monthly
Paints and related materials	Paint/Aerosols Storage room in Maintenance building and various storage lockers	12 oz to 5 gallon containers	Storage lockers in various locations throughout site	Maintenance building	Weekly
Waste paints, solvents and cleaners	Paint/Aerosols Storage room in Maintenance building	55 gallon drums as needed	Maintenance building	Maintenance building	Quarterly disposal
Container Wash	North of the Maintenance building at wash rack	1x 300 gallon above ground tank	Wash Rack	Wash Rack	Monthly

4.0 DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

4.1 Narrative Description of Potential Pollutant Sources

4.1.1 Industrial Processes.

Facility Operations

Cargo arrives at the site via ship and truck transport in intermodal cargo containers. Approximately 1,500 containers pass through the facility each day. A wide variety of materials are shipped in these containers, with the majority being non-hazardous cargo. The majority of the facility is used for the storage of the cargo containers. Containers entering into the facility by truck are visually inspected (externally) by gate security or other facility personnel. Any container observed to be leaking any material is immediately directed to a select and remote location. Following an evaluation, a hazardous materials emergency response action may be initiated according to TraPac's contingency plan for appropriate response. Clean up actions are taken as part of the response, including the cleaning or decontamination of HAZMAT spill areas.

The remainder of the site is occupied by a four-berth wharf and associated equipment, roadways, administration (Gatehouse) building, two satellite operations offices, and a maintenance & repair building.

Delivery of lubricating oils and ships stores to docked ships is carried out periodically using third-party ntractors to the vessel companies, who arrange shore-side delivery of the lubes utilizing tanker trucks, with water-side bunker deliveries using tank barges. Additional stores and supplies are delivered using standard vans or stake bed trucks.

Outdoor Storage, Manufacturing and Processing Activities

There are no manufacturing or processing activities carried out on the site covered by this plan. Outdoo storage is accommodated for several thousand sealed, intermodal cargo containers. These containers are stored both on trailer chassis, as well as, stacked-storage placement on the asphalt surface. Among the cargo containers at the site are various refrigerated containers. The refrigerated containers are plugged into electrical outlets located in the refrigerated container storage areas. In areas where electrical outlets are not available, diesel powered motor generators may be used to power the refrigeration units. The motor generators are refueled using a tank truck either in place wherever the trailers are located. Specially equipped "reefer" vehicles are used for routine maintenance and repair of the motor generators and refrigeration units while in the container storage yard.

Agricultural inspections may be performed at an inspection dock by order of Dept. of Agriculture. Although such inspections may be performed, all fumigation processes or applications are done at an off-dock facility under direction of the shipper or consignee of the goods.

Other activities take place at the site to include the repair of containers, chassis, and domiciled equipment. However, most repair tasks are performed inside or under cover, with segregated drainage from the common storm water drainage system by a clarifier drain receptacle.

4.1.2 Material Handling and Storage Areas.

Material Loading, Unloading, and Access Areas

As noted above, the primary function of the terminal is the loading and unloading of cargo containers from ocean going vessels, as well as, trucks and occasionally intermodal rail cars. There are currently eleven rail-mounted gantry cranes that are used for the loading and unloading of containers from vessels. There are also 10 rubber-tired gantry cranes (RTG), which are used for the loading and unloading of containers to or from chassis in the container storage areas. The gantry and RTG container handling cranes are assisted by use of heavy lift machines referred to as top or side handlers.

Another type of materials loading that takes place at the terminal is the routine refueling of vehicles. Diesel operated vehicles can be refueled from a 12,000 gallon underground ground storage tank via a fueling island or by one of two (2,000 or 5,000 gallon) mobile bulk diesel trucks. The UST is double-walled with a leak detection alarm and shutoff system. On-site equipment, such as forklifts and yard pick-ups, are fueled from one of two 1,000 gallon mobile bulk LPG vehicles. All tanks are replenished via commercial vendors via tanker truck. The mobile bulk diesel tank truck is also used to refill generator-mounted fuel tanks serving the refrigeration power units at the site on an as needed basis. Refueling of berthed ships is carried out by a third-party vessel fueling contractor which fuels vessels (with either heavy fuel oil or marine diesel fuel) via an on-water fueling barge. In addition, various other materials such as oils, greases, and paints are periodically supplied to the ships via tank truck or in 55-gallon drums and various smaller containers. Oily bilge wastewater is pumped from ships via a third-party contract waste management contractor using vacuum trucks driven onto the dock. Bilge pumping operations are scheduled on an as needed basis while vessels are berthed, and are performed by a third-party waste management contractor via on-dock vacuum trucks.

Chassis and Generator Maintenance, Repair and Power Shop Operations

Chassis maintenance and repair, and repair and maintenance of motor generators, engines, forklifts, and other facility equipment usually take place inside facility buildings. Equipment awaiting repair may be staged outside the buildings. Refrigerated containers and cargo containers are washed/cleaned at the reefer wash out area. A concrete steam cleaning pad, sloped and connected to an industrial sewel clarifier is also located at the reefer wash out area.

Maintenance and repair of Rubber Tire Gantries (RTG) is performed in an area located to the South of the Maintenance building.

Various materials such as motor oil, lube oil, automatic transmission fluid (ATF), and engine antifreeze/coolant are delivered to the Power Shop either in bulk or in 55-gallon drums by commercial vendors. Lubricants and oils are transferred from the bulk delivery truck or drums to one of three 220 gallon above ground storage tanks located outside the Power Shop. The tanks are equipped with overfill protection and are located underneath a cover/awning. All drum storage is placed on spill pallets adjacent to the stationary tanks, and are also under cover. Waste oils generated from engine and equipment maintenance at the Power Shop are transferred into under ground storage equipped with leak detection. A commercial used oil vendor pumps the used oil into a vacuum truck directly from the tank. Smaller quantities of lubricants and oils may be delivered in drums and smaller containers to the Maintenance Building.

Occasionally, 55 gallon or smaller containers of hazardous materials or wastes are accumulated at various other field locations in secondary containment units. Materials and wastes are delivered and picked up by commercial vendors directly to and from these areas with materials moved in and out of the storage areas immediately upon delivery. Deliveries and pickups are not normally permitted during storm events.

Paints and paint related materials used at the site are stored inside dedicated paint storage rooms or paint lockers in the maintenance shop. Empty paint containers, aerosols, and waste solvent containers are placed in the hazardous material/waste accumulation area. They are disposed as hazardous waste or scrap waste depending on determination of the residual product consistency.

Lead-acid automotive batteries are stored in the battery storage room at the maintenance building. Portable battery charging and jump-start packs are used in the power shop area, and on-board yard service trucks. Batteries, both wet and dry cell type are collected at the end of their life span and then recycled via an independent vendor. Commercial vendors make wet cell battery deliveries.

Spill and Leak Prevention and Response Procedures

TraPac observes and monitors material handling procedures and storage requirements to reduce the spills or leaks of at risk products. Proper hazardous materials and waste handling and storage techniques are part of the awareness requirements for employees who handle such materials.

TraPac's clean up equipment and procedures, along with reporting procedures for spills of significant materials, are designed to limit the potential effects of a spill into a storm water drain. Minor spills of hazardous materials which pose no danger to responding employees are contained and cleaned up using

dry methods, such as use of absorbent litter or pads, along with using absorbent booms for containment. Larger or higher hazard spills and releases are managed and cleaned up by public or contract emergency responders following

notification by TraPac personnel. Copies of the TraPac Emergency Contingency Plan are maintained in the facility, and all employees are trained to follow the Plan in the event of a hazardous materials or hazardous waste release. Leak and spill prevention is also addressed in the HAZCOM training module.

4.1.3 Dust and Particulate Generating Activities

The facility does not perform activities or operate processes which generate significant quantities of dust or particulates which would be released outside buildings or covered areas and/or could potentially impact or contact storm water.

4.1.4 Significant Spills and Leaks

TraPac has not experienced any endangering spills or leaks of chemicals or materials at the site. As part of the maintenance of the SWPPP, any future endangering spills or leaks will be documented in the ongoing SWPPP revisions.

4.1.5 Non Storm Water Discharges

The facility was evaluated for the presence of non-storm water discharges. The initial evaluation consisted of reviewing both proposed and actual operational activities at the facility and reviewing selected drainage system drawings. Ongoing methods include visually inspecting the facility and reviewing actual operational activities.

The following non-storm water discharges, authorized by the General Permit, may be present at the site on a periodic basis:

Uncontaminated storm water that has been temporarily stored or contained on-site -

- primarily in external hazardous materials/waste accumulation area secondary containment structures, and diesel and gasoline tank secondary containment areas. The various above ground storage tank area secondary containment structures are integral and therefore sealed against storm water.
- As detailed in the Storm Water Best Management Practices, personnel working in these areas are trained in spill prevention techniques, and any spills or leaks are cleaned up immediately. These areas are also inspected on a routine basis. Accordingly, any contained storm water should be free of significant contaminants. Personnel trained in the application of this SWPPP visually inspect any contained storm water for unusual conditions, odors, sheens, discolorations, etc. prior to discharge of the contained storm water. Any contaminated storm water is collected into containers and managed as an industrial waste or discharged to the industrial sewer via oil/water separator after a determination of contaminant type and review of sewer discharge permit(s). A written record of drainage or discharges from secondary containment areas is prepared and maintained as part of the facility's oil Spill Prevention and Countermeasures Plan.

Fire hydrant flushing

. As detailed in Section 5.0, the concrete and asphalt paved areas in those drainage areas associated with industrial activity are visually inspected for spills and leaks of chemicals and materials, stains and other potential contaminants as part of the quarterly visual observations prescribed in the Storm Water Monitoring Program. All paved areas

exhibiting significant staining or other contaminants are cleaned on an expedited basis Any hydrant flush water, therefore, will not produce significant contaminants prior to discharge in the site storm drain system.

Potable water related to the operation, maintenance and testing of potable water systems

The concrete and asphalt paved areas in those drainage areas associated with industrial activity are visually inspected for spills and leaks of chemicals and materials stains and other potential contaminants as part of the quarterly visual observations. All paved areas exhibiting significant staining or other contaminants are cleaned on an expedited basis. Any potable water, therefore, will not produce significant contaminants prior to discharge in the site storm drain system. (Drinking fountain water — Not Applicable)

Uncontaminated atmospheric condensates from refrigeration, air conditioning, and compressor condensate

The concrete and asphalt paved areas in those drainage areas associated with industrial activity are visually inspected for spills and leaks of chemicals and materials, stains and other potential contaminants as part of the quarterly visual observations. The condition of all compressors is also evaluated as part of the quarterly inspection program, and potential oil discharge sources on air compressor installations include spill containment procedures. All paved areas exhibiting significant staining or other contaminants are cleaned on an expedited basis. Any condensate discharge, therefore, will not produce significant contaminants prior to discharge into the storm drain system.

4.1.6 Soil Erosion and Sediment Controls

As the entire facility is paved or covered with concrete and/or asphalt, with the exception of small landscaped areas, the potential for soil erosion is extremely low. Significant erosion is not expected at the site.

4.2 Assessment of Potential Pollutant Sources

The following is an evaluation of source areas that may potentially affect storm water discharges at this facility. The noted sources are considered as being on-site. Pollution prevention measures in place are designed to mitigate the potential storm water effect of these possible events.

4.2.1 On-Site Potential Pollutant Source Areas

On-site sources are defined as potential sources of pollutants that are located on the TraPac facility property. Terminal management has control over the way these sources are managed and have developed management practices to reduce the risk of pollutant discharge from each source area.

The areas and activities identified below indicate where potential pollutants may affect storm water due to outdoor storage or other activities.

Diesel Storage Tanks and Dispensing Area Fuel Storage Tank and Dispensing Area Hazardous Materials/Waste Storage Areas Waste Oil Accumulation Tanks
Maintenance Shops
Outdoor Maintenance Areas
RTG Maintenance/Repair Area
Trouble Parking Area
Outdoor Material Loading/Unloading Areas
Outside Trucks
Container Storage Areas
Emergency Diesel Generators

Diesel Storage Tanks and Dispensing Area

Diesel for the filling and refueling of trucks and other diesel vehicles, which are used on the facility fo normal operations is stored in a 12,000 gallon, double-walled, alarm-connected, underground storage tank located on the North side of the Maintenance Building. There is a potential for spills of diesel fue during use of the diesel dispenser, or improper washing or hosing down of the fueling area.

Gasoline Storage Tank and Dispensing Area

Unleaded gasoline for limited refueling of yard-based vehicles is stored in a 500 gallon above ground tank located on the North side of the Maintenance Building, which is fully burmed and hand-pump operated. There is a potential for spills of gasoline during dispensing or refilling of the above ground tank, or from improper washing or hosing down of the fueling area.

Hazardous Material/Waste Storage Areas

Hazardous materials used in the Maintenance Shop are stored in hazardous materials/waste storage/accumulation barrels or containers located at the North area of the maintenance shop. The various waste materials accumulated are stored in drums and/or smaller containers. The materials stored in these areas include various virgin and waste organic and inorganic non-chlorinated cleaners, aerosol cleaners, lubricants and adhesives, greases, motor oil, lube oil, ATF fluid, various waste materials, and various empty containers and drained oil filters. Spills and leaks are potential, but all drums and containers awaiting disposal pick up are stored on spill pallets to prevent product escape.

Waste Oil Accumulation Tanks

Waste or used oil generated from the shop is collected in a 1,000 gallon underground, double walled, alarm-connected tank. An independent used oil vendor periodically picks up the product using a vacuum truck. There is a potential for spills during the pumping of these tanks, or improper washing or hosing down of the tank areas.

Maintenance Shops

While maintenance activities take place primarily indoors, occasional maintenance activities may occur immediately outside the shop, or equipment may be staged outside the shop while awaiting repair. Spills or leaks that result from these maintenance activities have the potential to impact the storm water.

Outdoor Maintenance Areas

Minor maintenance is performed all across the site on equipment in use or that may be inoperable. Spills or leaks that result from these maintenance activities have the potential to impact storm the water.

RTG Maintenance/Repair Areas

intenance and repair of Rubber Tire Gantries (RTG) are performed in various outdoor areas. Spills or leaks from equipment or materials not stored or placed over the concrete pads have the potential to impact storm the water.

Trouble Parking Area

The handling of hazardous materials inside cargo containers is a minor portion of the container traffic through the facility, but may include a wide range of hazardous materials. Incoming containers observed to be leaking any material are immediately directed to a select area as deemed necessary for personne affety, and a hazardous materials emergency response action is initiated according to TraPac's contingency plan. An appropriate response, to include hazard identification, containment, cleanup, and decontamination normally results in minimal or no impact to the storm water concerns.

Outdoor Material Loading/Unloading Areas

Hazardous materials, including oils, paints, lead-acid batteries, inorganic and organic cleaners and solvents, ATF, and other materials are unloaded or transferred from commercial vendors vehicles to the various storage areas in or near the maintenance shop. Any spills or leaks of materials during loading, unloading or material handling activities could impact the storm water.

Trucks

Approximately 700,000 independently owned highway trucks pass through the facility each year. Each of these trucks has the potential to leak small amounts of pollutant product onto the ground. There is also some potential of fuel tank or hydraulic ruptures while the trucker is in the facility. This could impact the storm water discharges from the facility.

Container Storage Areas

Container storage of cargo takes place on the majority of the site. The majority of these containers are completely enclosed; however, some open top containers are utilized for large cargo items. These items include such things as large tires and equipment. The probability of leaks from cargo containers impacting storm water in minimal. Refrigerated containers are stored at the site in a dedicated area at the site. The trailer-mounted diesel fuel tanks (serving the refrigeration unit's power generator) are periodically refilled via a mobile tank truck. The possibility exists for petroleum hydrocarbon leaks from these tanks, as well as spills during fueling operations, which could impact the storm water.

Emergency Diesel Generators

The facility is equipped with four diesel fueled emergency standby electric power generators (2 mobile & 2 stationary). Each generator is equipped with an integral fuel tank. There is a potential for spills or leaks of diesel fuel to occur during use refilling of the generator's fuel tank, or a leak from the tank itself, or improper washing or hosing down of the fueling area.

4.3 Table Of Potential Pollutants Likely to be Present in Storm Water Discharge

Potential source areas that may be expected to add significant quantities of pollutants to storm water discharges are identified in the table below. All potential source areas listed in the table are identified within the table. An evaluation of these source areas is discussed in Sections 4.1 and 4.2. Selected pollution prevention measures (Best Management Practices) are identified in the following detail table summary:

Summary Assessment of Potential Pollution Sources And Corresponding Best Management Practices

Source Areas	Primary Activity	Pollutant Source	Potential Pollutants	Estimated Annual Quantity	Best Management Practices
Diesel Storage Tank and Dispensing Area	Fueling	Spills and leaks during delivery	Petroleum hydrocarbons	undetermined	Tank system fill assembly equipped with check valve at fill pipe. Tank fill pump interlocked to high level (90%) alarm and shut off (95%) alarm and pump controller and leak detection system alarm and pump controller. The tank is connected with overflow connection to effect proper spill prevention. Inspect fueling areas regularly to detect, correct and prevent problems. Train employees and fueling vendors on proper fueling, cleanup, and spill response techniques and responsibilities. Staging of hydrocarbononly spill adsorbent and dike supplies.
		Spills caused by topping off fuel tanks or fueling overflows	Petroleum hydrocarbons	undetermined	Dispensing island and bulk loading dispenser installation equipped with sloped, dedicated spill collection pad which drains via double wall pipe into a dedicated 12,000 gallon underground double walled spill holding tank equipped with leak detection system. Tank system equipment is equipped with automatic tank gauge. Implement proper spill prevention control (SPCC) program Train employees on proper fueling, cleanup, and spill response techniques Staging of oil-only spill adsorbent and dike supplies. Fueling area paved with concrete.
		Hosing or washing down fuel area	Petroleum hydrocarbons	undetermined	Use dry cleanup methods rather than hosing down area Train employees on proper fueling, cleanup, and spill response techniques.

	,				
		Leaking storage tanks and discharge of contained leak	Petroleum hydrocarbons	undetermined	Tanks are double walled steel installations (110% integral secondary containment) equipped with leak detection alarm systems. Tanks are projectile and impact resistant construction. Tank installations protected by 12"x5' bollards. Fueling traffic is directed/segregated by concrete curbs painted yellow. Inspect fueling areas and leak detection and containment systems regularly to detect, correct and prevent problems. Implement adequate preventive maintenance and awareness program to prevent tank and line leaks from secondary containment release fittings. Train employees on proper spill response and contained leak disposition procedures Staging of hydrocarbon-only spill adsorbent and dike supplies.
		Rainfall running off fueling area, rainfall running onto and off fueling area, and discharge of collected rainfall	Petroleum hydrocarbons	undetermined	Train employees on proper fueling, cleanup, and spill response techniques to minimize entrained contaminants. Inspection of collected storm water in containment burm prior to discharge. Use of hydrocarbon-only absorbent boom lowered inside adjacent storm water catch basin.
Gasoline Storage	Fueling	Spills and leaks	Petroleum	undetermined	Tank system fill assembly equipped with spill collection pan and

				T	
33 A	Tank and Dispensing Area	during delivery	hydrocarbons		Check valve at fill pipe. Tank fill pump interlocked to high level (90%) alarm and shut off (95%) alarm and pump controller and leak detection system alarm and pump controller. Tank is installed within a concrete containment area with 6" burm. Implement proper spill prevention control (SPCC) program. Inspect fueling areas regularly to detect, correct and prevent problems. Train employees and fueling vendors on proper fueling, cleanup, and spill response techniques and responsibilities. Staging of hydrocarbon-only spill adsorbent and supplies.
		Spills caused by topping off fuel tanks or fueling overflows	Petroleum hydrocarbons	undetermined	Dispenser island equipped with emergency shear valve. Implement proper spill prevention control (SPCC) program Train employees on proper fueling, cleanup, and spill response techniques. Staging of hydrocarbon-only spill adsorbent and dike supplies. Fueling area paved with concrete
		Hosing or washing down fuel area	Petroleum hydrocarbons	undetermined	Use dry cleanup methods rather than hosing down area Train employees on proper fueling, cleanup, and spill response techniques.
		Leaking storage tanks and discharge of contained leak	Petroleum hydrocarbons	undetermined	Tank is double walled steel installation (110% integral secondary containment) equipped with leak detection alarm systems. Tank is installed within a concrete containment area with 6" curbs. Tank installations protected by 12"x5' bollards. Tank is projectile and impact resistant. Inspect fueling areas and leak detection and containment systems regularly to detect, correct and prevent problems Implement adequate preventive maintenance and awareness program to prevent leaks. containment release fittings. Train employees on proper spill response and contained leak disposition procedures. Staging of hydrocarbon-only spill adsorbent and supplies.

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		Rainfall running off fueling area, rainfall running onto and off fueling area, and discharge of collected rainfall	Petroleum hydrocarbons	undetermined	Train employees on proper fueling, cleanup, and spill response techniques to minimize entrained contaminants. Inspection of collected storm water in containment burm prior to discharge. Use of hydrocarbon-only absorbent boom lowered inside nearby storm water catch basin.
Indeterminate	Material and waste storage and dispensing	Spills and leaks during re-containerization	Petroleum hydrocarbons, solvents, paints	undetermined	Use secondary containment pallets to store drums to prevent contamination of concrete containment. Use of used oil filter drainer and located inside Power Shop in Maintenance building. Inspect storage areas regularly to detect, correct and prevent problems. Train employees on proper container and materials management, spill prevention, cleanup, and spill response techniques. Staging of spills absorbents and dike supplies.
		Spills and leaks during container handling and material/waste receiving and pickup	Petroleum hydrocarbons, solvents, paints	undetermined	Inspect containers for leaks, deterioration and damage prior to unloading/acceptance from vendor. Use proper drum handling equipment to minimize potential for drum damage. Immediately move containers into secondary containment devices upon receipt. Train employees on proper container and materials management and handling. Staging of spill absorbents and dike supplies.
	8	Hosing or washing down storage area	Petroleum hydrocarbons, solvents, paints	undetermined	Use dry cleanup methods rather than hosing down area. Train employees on proper cleanup and spill response techniques.
		Leaking containers	Petroleum hydrocarbons, solvents, paints	undetermined	Inspect containers and storage and dispensing areas regularly to detect, correct and prevent problems. Staging of spill absorbents and dike supplies. Use secondary containment pallets to store drums.
		Rainfall running onto and off storage and accumulation areas	Petroleum hydrocarbons, solvents, paints	undetermined	Cover storage or accumulation areas (if feasible). Use enclosed cabinets, closed/covered secondary containment pallets or similar storage systems to store drums where possible. Inspect contained storm water for evidence of contamination and containers/area for evidence of spills or leaks prior to release or discharge of contained water

Used Oil	Chille and India	Petroleum	1 . 1	I m 1 1 1 1 1 1 m
Accumulation Tank	Spills and leaks during used oil draining and tank filling	hydrocarbons	undetermined	Tank is equipped with overfill and leak detection alarms. The tank is filled via waste oil rack from inside the building via enclosed hoses or from waste oil carts. Implement proper spill prevention control (SPCC) program. Train employees on used oil collection and tank filling procedures and cleanup and spill response techniques. Staging of petroleum-only spills absorbents and dike supplies. Inspect tanks regularly to detect, correct and prevent problems
	Leaking tanks and discharge of contained leak	Petroleum hydrocarbons	undetermined	Tanks are double walled installations (110% integral secondary containment) equipped with leak detection alarm systems. Tank installations protected by 8"x5' bollards. Inspect tank and oil cart areas and leak detection and containment systems regularly to detect, correct and prevent problems Implement adequate preventive maintenance and awareness
	Spills and leaks during tank pump-out	Petroleum hydrocarbons	undetermined	Program to prevent tank and line leaks from secondary containment/interstitial drain valve. Lock interstitial drain valve and post notice/sign re draining procedures Train employees on proper spill response and contained leak disposition procedures. Staging of petroleum-only spills absorbents and dike supplies. Monitor used oil vendors during tank pumping activities to ensure leaks or spills are properly cleaned up. Use absorbent pads under pump out connection. Train employees and vendors on proper pump-out, cleanup, and
				spill response techniques and responsibilities. Staging of petroleum-only spills absorbents and dike supplies.

1	1	Rainfall running	Petroleum	undetermined	Cover storage or accumulation
		onto and off storage and accumulation areas	hydrocarbons, solvents, paints		areas (if feasible). Use enclosed cabinets, closed/covered secondary containment pallets or similar storage systems to store drums where possible. Inspect contained storm water for evidence of contamination and containers/area for evidence of spills or leaks prior to release or discharge of contained water
Used Oil Accumulation Tank		Spills and leaks during used oil draining and tank filling	Petroleum hydrocarbons	undetermined	Tank is equipped with overfill and leak detection alarms. The tank is filled via waste oil rack from inside the building via enclosed hoses or from waste oil carts. Implement proper spill prevention control (SPCC) program. Train employees on used oil collection and tank filling procedures and cleanup and spill response techniques. Staging of petroleum-only spills absorbents and dike supplies. Inspect tanks regularly to detect, correct and prevent problems
		Leaking tanks and discharge of contained leak	Petroleum hydrocarbons	undetermined	Tanks are double walled installations (110% integral secondary containment) equipped with leak detection alarm systems. Tank installations protected by 8"x5" bollards. Inspect tank and oil cart areas and leak detection and containment systems regularly to detect, correct and prevent problems Implement adequate preventive maintenance and awareness
					Program to prevent tank and line leaks from secondary containment/interstitial drain valve. Lock interstitial drain valve and post notice/sign re draining procedures Train employees on proper spill response and contained leak disposition procedures. Staging of petroleum-only spills absorbents and dike supplies.

		Spills and leaks during tank	Petroleum hydrocarbons	undetermined	Monitor used oil vendors during tank pumping activities to ensure
		pump-out	ay at oota oons		leaks or spills are properly cleaned up. Use absorbent pads under pump out connection. Train employees and vendors on proper pump-out, cleanup, and spill response techniques and responsibilities. Staging of petroleum-only spills absorbents and dike supplies.
Maintenance Shop	Trailer, generator, and motor repair and maintenanc e.	Drips and leaks from equipment to be repaired	Petroleum hydrocarbons, engine coolant and solvents	undetermined	Repair/work on oil or fuel containing equipment inside the building. Use rain cover and/or containment burms/booms for repair work outside the building. Identify and store leaking or dripping equipment inside the building until repaired. Use drip pans and/or absorbent pads to collect drips and leaks. Inspect equipment staging areas regularly to detect leaking equipment as soon as possible.
		Spills and leaks during oil draining and oil and fuel filling	Petroleum hydrocarbons	undetermined	Use drip pans and/or absorbent pads to collect drips and leaks. Use appropriate filling and draining devices to minimize spillage. Train employees on proper materials management, cleanup, and spill response techniques. Staging of petroleum-only spill absorbents and dike supplies.
		Hosing or washing down equipment staging or repair areas	Petroleum hydrocarbons, engine coolant and solvents	undetermined	Use dry cleanup methods rather than hosing down area. Train employees on proper cleanup and spill response techniques. Wash or clean equipment at the Reefer Wash Building (inside wash racks or outside covered/burmed steam clean pad).

		Leaks from air compressor oil trap/coalescent filter	Petroleum hydrocarbons	undetermined	Install secondary containment pans underneath filter. Inspect compressor areas regularly to detect, correct and prevent oil leaks.
Covered Equipment Storage Area (Power Shop)	Oil and automotive fluid storage	Leaks and spills during delivery to motor oil and lube oil storage tanks		undetermined	Oil tank and lube oil tanks are covered by awning. Implement proper spill prevention control (SPCC) program. Inspect tank areas regularly to detect, correct and prevent problems. Train employees and fueling vendors on proper filling, cleanup, and spill response techniques and responsibilities. Staging of petroleum-only spills absorbents and dike supplies.
		Leaking storage tanks and discharge of contained leak	Petroleum hydrocarbons	undetermined	Tanks are double walled installation (110% integral secondary containment) equipped with leak detection alarm systems. Inspect tank areas and leak detection and containment systems regularly to detect, correct and prevent problems Implement adequate preventive maintenance and awareness program to prevent tank and line leaks from secondary containment release fittings. Train employees on proper spill response and contained leak disposition procedures.
		Leaking oil and lubricant transfer hoses	Petroleum hydrocarbons	undetermined	Hoses run directly inside the building from the covered tanks and run in a pipe chase trench when running over floor surfaces.
Outdoor Maintenance Areas	Generator and motor maintenance	Drips and leaks from equipment to be repaired	Petroleum hydrocarbons	undetermined	Minimize the amount of oil-containing equipment requiring maintenance outdoors. Use drip pans and/or absorbent pads to collect drips and leaks. Inspect equipment areas regularly to detect and repair leaking equipment as soon as possible.
		Spills and leaks during oil draining and oil and fuel filling	Petroleum hydrocarbons	undetermined	Use drip pans and/or absorbent pads to collect drips and leaks. Use appropriate filling and draining devices to minimize spillage. Train employees on proper materials management, cleanup, and spill response techniques. Staging of petroleum-only spill absorbents and dike supplies in fueling vehicle.
		Hosing or washing down equipment staging or repair areas	Petroleum hydrocarbons	undetermined	Use dry cleanup methods rather than hosing down area. Train employees on proper cleanup and spill response techniques. Wash or clean equipment at the Reefer Wash Rack.
	leaking cargo	Leaks from hazardous materials cargo containers	Varied (from cargo)	undetermined	Train employees on proper spill response techniques. Initiate hazardous materials contingency plan. Stage a spill containment kit in the area. Use portable secondary containment pads until leak is controlled. Clean, wash or otherwise decontaminate area after emergency response.

PTG	Gonomton	Drive and lealer	I Data de	1 1	
RTG Maintenance / epair Area	Generator, crane, and motor maintenance	Spills and leaks during oil draining and	Petroleum hydrocarbons and battery acid Petroleum hydrocarbons	Indeterminat e	Minimize the amount of oil-containing equipment requiring maintenance outdoors. Use drip pans and/or absorbent pads to collect drips and leaks. Area drains into an oil/water separator connected to the industrial sewer system. Inspect equipment areas regularly to detect and repair leaking equipment as soon as possible. Train employees to handle batteries to minimize potential for battery breakage. Staging of spills absorbents and dike supplies Use drip pans to collect drips and leaks. Use appropriate filling and draining devices to minimize spillage. Train employees on proper
		filling Hosing or	Patrolou	Indet	materials management, cleanup, and spill response techniques. Staging of spill absorbents and dike supplies.
		washing down equipment staging or repair areas	Petroleum hydrocarbons	Indeterminat e	Use dry cleanup methods rather than hosing down area. Train employees on proper cleanup and spill response techniques. Ensure all wash/cleaning water drains into the area's oil/water separator connected to the industrial sewer system.
Outdoor Material Loading/Unloa ding Areas	Hazardous material receiving	Spills and leaks during container handling and material receiving (and battery) pickup	Petroleum hydrocarbons, solvents, paints, battery acid	Indeterminat e	Inspect containers and batteries for leaks, deterioration and damage prior to unloading/acceptance from vendor. Inspect used batteries for leaks or damage prior to pickup by vendor. Use proper container handling equipment to minimize potential for container damage. Move containers into burmed or inside storage areas immediately upon receipt. Load (or pump) wastes onto vendor vehicle directly from burmed area. Material deliveries suspended prior to and during storm events. Train employees on proper container and materials management and handling. Train employees on proper materials management, cleanup, and spill response techniques. Staging of spill absorbents and dike supplies.
Trucks	Movement of cargo containers	Drips of oil from engines	Petroleum hydrocarbons	19.8 gallons (75 liters) 1	Properly maintain facility vehicles.
		Spills and leaks from fuel tank ruptures	Petroleum hydrocarbons	е	Place portable secondary containment under fuel tank leaks. Train employees and drivers in proper and spill response techniques and responsibilities. Clean, wash or otherwise decontaminate affected area after emergency response.
Container Storage Areas	cargo containers	Leaks from hazardous materials cargo containers	Varied (from cargo)	е	Inspect incoming cargo containers for leaks upon entry to facility and immediately relocate them to Trouble Parking Area and initiate contingency plan/clean up procedures. Train employees on proper cleanup and spill response techniques.

		Leaks from hide containers	Tannic acid	Indeterminat e	Inspect hide container storage areas regularly to detect and respond to leaking containers as soon as possible. Train employees on proper cleanup and spill response techniques. Clean, wash or otherwise decontaminate affected area after emergency response.
		Spills and leaks during reefer fueling operations	Petroleum hydrocarbons	Indeterminat e	Use portable secondary containment during fueling. Train employees on proper cleanup and spill response techniques. Clean, wash or otherwise decontaminate affected area after emergency response.
		Spills and leaks from reefer fuel tanks	Petroleum hydrocarbons	Indeterminat e	Inspect hide container storage areas regularly to detect and respond to leaking containers as soon as possible. Train employees on proper cleanup and spill response
Emergency diesel generators	Generator fuel tank operation and filling	Spills and leaks from generator fuel tank	Petroleum hydrocarbons	Indeterminat e	Use portable secondary containment during refilling of tank. Inspect tank system and area regularly to detect, correct and prevent problems. Stage petroleum-only spill absorbents and dike inside generator cage or in fueling vehicle. Train employees and fueling vendors on proper fueling, cleanup, and spill response techniques and responsibilities.

5.0 STORM WATER BEST MANAGEMENT PRACTICES

Storm water management controls, known as Best Management Practices (BMP's) are those administrative, procedural, or engineering based practices which may prevent, eliminate, reduce or otherwise control the discharge of pollutants into storm water and the storm drain system. The following describes procedures that will be implemented to ensure that the intent of the General Storm Water Permit is achieved:

5.1 Non-Structural BMP's

5.1.1 Good Housekeeping

Good housekeeping requires maintenance of clean, orderly facility areas that discharge storm water. Material handling areas will be routinely inspected and cleaned, if necessary, to reduce the potential for pollutants to enter the storm water system. These areas include:

- Diesel Storage Tanks and Dispensing Area
- Gasoline Storage Tank and Dispensing Area
- Hazardous Materials/Waste Storage and Accumulation lockers.
- Maintenance Shop
- Covered Equipment Storage Area
- Outdoor Maintenance Areas
- RTG Maintenance/Repair Areas
- Trouble Parking Area
- Outdoor Material Loading/Unloading Areas
- Container Storage Areas
- Emergency Diesel Generators

Outside areas will be prevalently dry swept rather than hosed or washed down whenever the areas are to be cleaned.

Employees will be required to follow proper procedures for the receiving, handling, storage, collection, and disposal of hazardous or industrial materials and waste products, such as fuels, machine and automotive oils, paint products, etc., and will be instructed to perform these activities inside or under cover, as much as practicable. Additional housekeeping measures to be taken to include:

- promptly cleaning up any spills or leaks (including the cleaning of any spills or residues in the spill pans at the diesel and gasoline tank fill pipes) and removing all absorbents used to clean up spills or leaks,
- keeping outside equipment exteriors clean of oil and grease,
- use of oil absorbent pads to collect drips and incidental spills,
- steam/pressure washing of all outside areas which are heavily oil or chemical stained and collection and proper collection and disposal of the residue or wash water generated,
- a keeping chemical storage areas neat and dry,
- keeping all hazardous materials containers and areas neat, and
- always returning all materials to their proper storage area with lids and caps in place.

Material handling area inspections are performed on a quarterly basis. The inspections will include address to ensure that previous housekeeping problems are identified and have been corrected. Blank form inspection sheets will be used to verify the inspections.

5.1.2 Preventive Maintenance

Preventive maintenance involves inspection and maintenance of storm water conveyance systems, storm water protection systems, and structures, such as burms, dikes and other secondary containment systems, spill collection tank, etc. also considered is facility equipment and systems that could fail and result in discharges of pollutants to storm water, such as aboveground tanks, leak detection systems, and secondary containment drainage valves or fittings. These areas and equipment include:

Diesel Storage Tanks and Dispensing Area:

- . hydrocarbon detection/rain diversion
- . secondary containment and spill pads
- overflow line
- . dispensing area and hoses
- . tank loading piping and systems
- . external tank surfaces
- . general area and containment structure
- . leak detection and high level alarm systems

Mobile Diesel Tank:

- . portable secondary containment burm/pad (if supplied)
- . spill absorbent pads
- . dispensing system and hoses
- . tank filling/loading piping and systems
- . external tank surfaces

- . general condition or tank and systems
- Gasoline Storage Tank and Dispensing Area:
 - . leak detection and high level alarm systems
 - . secondary containment and drip pan
 - . spill absorbent pads
 - . dispensing area and hoses
 - . tank loading piping and systems
 - external tank surfaces
 - . general area and tertiary containment structure
- Hazardous Materials/Waste Storage areas and Accumulation Areas
- Emergency Diesel Generators
- Clarifier System
- Catch Basins and Drains

Inspection of all storm water conveyance and protection systems, as well as facility equipment, are performed as required during dry-season observations, wet-season observations and during storm water sampling events. A tracking or follow-up procedure will be used to ensure appropriate address has been effected to program compliance. Inspections and maintenance activities will be documented, recorded and retained for the required legal period of time as part of the SWPPP. Blank forms for documentation of compliance are incorporated in the SWPPP. It is the responsibility of the Storm Water Pollution Prevention Team to ensure that all action items are addressed in a timely fashion, and that routine and frequent identification of deficient conditions are made, along with effective abatement of any discovered problem.

5.1.3 Spill Prevention and Response

Spill prevention and response requires the identification of areas where significant materials can spill into or otherwise enter the storm water conveyance systems and their accompanying drainage points, preventing leaks and spills, and responding to spills either defensively or taking aggressive action to arrest and clean up a spill. As noted below in Section

Employee Training', proper handling and storage of hazardous materials and waste are part of the training provided to employees who handle such materials, as are spill and leak awareness and initial response procedures. TraPac's clean up equipment and procedures, along with observation and reporting procedures for spills of significant materials, are intended to limit the potential pollutants to the storm water. Minor spills of hazardous materials that pose no danger to responding employees are cleaned up using dry methods, such as use of proper absorbents, or by using absorbent booms or pads. Larger or higher hazard spills and releases are managed and cleaned up by contracted emergency response firms. All employees are trained to follow the prescribed contingency plan in the event of a hazardous materials or hazardous waste release. Spill control and cleanup supplies are staged in areas storing or using significant materials that could spill into or otherwise enter storm water conveyances at the facility. Commercially obtained spill response kits containing absorbent pads, socks, and/or booms sufficient to contain or dike small to moderate volume releases of petroleum products, acids, aqueous cleaners, solvents and other materials are staged on site.

5.1.4 Material Handling and Storage

Materials, equipment, and vehicle management practices used to minimize the contact of potential pollutants with storm water discharges include the following:

- Quarterly inspections will be performed of the reefer storage area to evaluate any visible significant staining of the asphalt surface. Periodic informal inspections will be performed to detect visible leak or spills.
- In all circumstances where possible, vehicle maintenance work and fluid changes will be performed inside or under covered structures. Equipment awaiting repair will be stored or held inside or under cover whenever possible.
- For equipment that cannot be serviced under covered areas, all maintenance which requires the change of fluids or has the potential to release pollutants which could be flow into the storm water will be performed with drip pans, portable secondary containment pads, non-permeable tarps under the equipment, or performed at the RTG maintenance and repair area. Any spills within the area will promptly be cleaned up in accordance with procedures outlined in TraPac's response plan.
- For equipment awaiting repair that cannot be staged or held inside or under cover will be evaluated for the potential for oil or fluid leaks and drip pans, portable secondary containment pads or non-permeable tarps will be placed under the equipment.
- Quarterly written inspections will be performed of the maintenance shop exterior area to evaluate any visible significant staining of the asphalt surface. Weekly inspections will be performed to detect visible leaks or spills, and to evaluate material/waste handling practices and general housekeeping. The weekly inspections are part of the facility's hazardous waste generator inspection control.
- Storage of materials inside, within a storage building, shed or under some type of roof or other cover.
- Storage and handling or movement of materials on secondary containment pallets or covered secondary containment pallets or storage devices.
- Keeping containers closed tightly to reduce the possibility of spills or leaks if the container tips over.
- □ For those containers or drums that must be stored outside, the use of plastic drum top caps or tarps to prevent storm water contact with any residues on top of the drum.
- Inspecting containers and batteries for leaks, deterioration and/or damage prior to unloading and acceptance from the vendor; and refusing acceptance of any damaged materials or containers.
- Whenever possible, deliveries of fuels, oils, chemicals or other materials, and pickup of hazardous wastes will be suspended or postponed prior to and during storm events.
- Moving materials to inside storage areas immediately upon receipt.
- Using the proper type of dispensing or re-containerization equipment when dispensing from or adding to a container to reduce the possibility of spills and overflows.
- The use of the following devices on the above ground diesel, gasoline, motor oil and used oil tanks:
- Diesel tank system:
- . Tanks are double walled installations (110% integral secondary containment) equipped with leak detection alarm systems.
- . Tanks are positioned with full containment structures
- . Tank system fill assembly equipped with check valve at fill pipe.
- . Tank fill pump interlocked to high level alarm and shut off alarm and pump controller and leak detection system alarm and pump controller.
- . Dispenser hoses equipped with vapor (and liquid) recovery nozzles.
- Bulk loading, tank filling area and vehicle dispenser system includes sloped concrete spill collection pad.

- Gasoline tank system:
- . Tank is single-walled construction with full surrounding containment
- . Tank equipped with visual leak detection
- Tank system fill assembly equipped with check valve at fill pipe.
- Dispenser hose equipped with vapor (and liquid) recovery nozzle.
- Waste oil tank:
- . Tank is double walled UST installation equipped with leak detection alarm systems.
- . Tank equipped with audible and visual overfill and leak detection alarms.
- Motor oil tank and lube oil tanks:
- . Tank is double-walled construction equipped leak detection alarm systems.
- . Tank is equipped with visual overfill detection
- . Tank installations are set back inside a containment area.
- . Hoses run directly inside the building from the tanks and dispense from overhead, with drip pan containment over floor surfaces.

5.1.5. Employee Training

General Training Requirements

Storm Water Pollution Prevention Plan training will be provided for all personnel having a specific role ir the Storm Water Pollution Prevention Plan. This training will inform personnel about the overall objective of the Plan and explain each individual's specific responsibilities for implementing the plan. Training will be provided annually and training completion will be documented for each individual receiving the training. Additionally, basic storm water pollution prevention concepts and summary requirements are provided to all facility personnel.

Personnel Requiring Training

All persons who will be making storm water discharge, drainage area, or outfall or catch basin observations, collecting samples or preparing documents will receive training. Persons receiving training will be required to execute an acknowledgement of attendance and subject understanding. Should a change in pollution prevention personnel event, any required training will be effected in a timely manner.

Types of Training

Two types of training will be provided. The first will be general training which include a discussion of the following topics:

- Overall pollution prevention goals and the role of the SWPP Team
- Preventive maintenance
- □ Good housekeeping practices
- Material handling procedures
- Spill prevention and response
- Storm water management practices and BMP's.
- Record keeping
- Storm water sample collection
- Monitoring practices

The training will be effected by via means of formal presentation and hands-on demonstration, which may also include the advent of technology using on-line provided information.

Trainer Requirements

The general training will be provided internally by TraPac personnel, or by an outside vendor familiar with site and the SWPPP. The person providing the training will be familiar with the facility as well as the SWPPP and the requirements of the General Storm Water Permit. Training for sampling will be assisted

by a vendor firm with experience in water sampling. The personnel providing the training or sampling will also be familiar with the SWPPP and the requirements of the California General Storm Water Permit.

Training Schedule

General training will be conducted prior to commencement of an individual's storm water managemen responsibilities. Annual training will be conducted thereafter. Storm water sampling training will be conducted prior to the commencement of a storm water sampling event. This training will be conducted any time there is a change in storm water sampling personnel.

5.1.6. Waste Handling and Recycling

A written Hazardous Waste Management and Pollution Prevention procedure/program that contains specific direction to facility personnel regarding proper hazardous and industrial waste identification containerization, labeling, storage and waste minimization and pollution prevention. Copies of this program are maintained in various locations at the facility. The waste handling and recycling procedures for minimizing or preventing waste into storm water includes:

- □ Used oil, waste antifreeze, waste batteries, and used oil filters are collected and recycled off site.
- Used oil collection in a double walled UST tank.
- Used oil filters are drained and accumulated in a closed and covered container
- Cleaning solvents used are primarily citrus-based non-toxic organic cleaners.
- Hazardous materials vendors are requested to recommend or provide non-hazardous alternative materials.
- Large funnels are used for the re-containerization of liquids wastes.
- Hazardous wastes are accumulated and contained in secured or controlled hazardous waste storage areas.
- Drums are moved using proper drum handling devices or moved on pallets.
- Waste pickups are not conducted immediately prior to or during storm events.

5.1.7. Record Keeping and Internal Reporting

The SWPPP team is responsible for ensuring that the following records and reports are completed or developed, and retained. The team is also responsible for ensuring that TraPac's responsible management receives either report copies, or a comprehensive summary of the SWPPP information. All reports and checklist blank forms are included in the SWPPP, with completed reports and checklists available on demand by authorities.

Records and reports prepared or maintained include the following:

- Quarterly preventive maintenance and inspections of equipment and structures.
- SWPPP training documentation forms.
- Annual comprehensive site compliance audit and inspections.
- Quarterly non-storm water discharge and drainage area visual inspections of all storm water discharge locations and containment areas
- □ Corrective action records
- Storm water visual observations
- Spill reports and records.
- Annual RWQCB compliance report

5.1.8. Erosion Control and Site Stabilization

The TraPac facility is not equipped with specific storm water related erosion control or site stabilization measures. With the exception of decorative landscape areas, the entire facility is paved.

5.1.9. Routine Inspections

Periodic inspections of potential pollutant sources are included in the quarterly inspections and preventive maintenance inspections described previously.

5.1.10. Quality Control

Elements of the Quality Control Program

The Quality Control program is designed to confirm that all elements of the Storm Water Pollution Prevention Program are performed and that all monitoring is conducted by trained personnel.

The following are the elements of this Program:

- Quarterly site non-storm water discharge and drainage area inspections
- Wet season discharge visual observations
- Annual comprehensive site compliance audit
- Storm water sampling
- Proper storm water pollution prevention plan amendments
- Employee training

The Storm Water Pollution Prevention Team is responsible for implementing the Quality Control

Storm Water Monitoring Program Quality Control Checklist

A checklist will provide a means to verify that the elements of the Quality Control program have been properly performed. The Storm Water Management Quality Control checklists will be completed by the SWPPP team in June of each year along with the annual site inspection and the preparation of the annual report to the Regional Water Quality Control Board. If the checklist reveals that a particular element of the plan is not being properly performed, steps will be taken to correct the problem. These steps may include such things as retraining the responsible individuals for the particular element, changing the methods by which the element is implemented or changing the blank form on which the information concerning the element is recorded in order to provide more detailed guidance to the person using the form.

5.2 Structural BMP's

5.2.1. Overhead Coverage

The following potential pollutant sources are covered with a roof, awning, overhang or other means of preventing storm water contact:

- Covered Equipment Storage Area An awning or roof completely covering the motor oil tank, lube oil tanks and air compressor at the Power Shop.
- Compressed Air Plant air compressor installation located under a roof within an enclosed building.
- Battery Storage Rooms, Paint Storage Rooms, Battery Charging Stations, motor, chassis and generator maintenance and repair areas all located under roofs within enclosed buildings.

5.2.2. Retention Ponds

TraPac's facility does not have any retention ponds, basins or other structures to prevent or restrict the discharge of storm water from the site.

5.2.3. Control Devices

With the exception of the secondary containment structures described below and standard site grading and storm water flow zones away from site buildings and structures, which also serve to divert storm water run on into potential pollutant sources, TraPac does not have any configuration design o structures to specifically channel or divert the discharge of storm water from the site or potential pollution sources.

5.2.4. Secondary Containment Structures

The following potential pollutant sources are equipped or managed within secondary containment to collect or contain leaks or spills:

- u Used oil tank is equipped with integral (double wall) .
- Motor oil tank is equipped with integral secondary containment.
- □ Lube oil tanks are equipped with integral secondary containment.
- Diesel tanks are equipped with integral secondary containment.
- Gasoline tank is equipped with integral secondary containment.
- Paint Storage Room at Maintenance Shop is equipped with secondary containment locker.

5.2.5. Treatment

With the exception of the oil and water separators connected to the industrial sewer at the East of the Maintenance building, TraPac facility is not equipped with any constructed storm water treatment devices or structures.

6.0 ANNUAL COMPREHENSIVE SITE COMPLIANCE AUDIT

6.1 Identification Of Storm Water Collection Areas

The following catch basins and slotted drains have been identified at the site:

Storm Water Collection, Observation and Sampling Areas

		Type of Observation & Sample Loc.					Type of Observation & Sample Loc.		
Drain No.	Catch Basin/Slotted Drain/Collection Area		Storm	Sample	Drain No.	Catch Basin/Slotted Drain/Collection Area		Non- Storm Water Visual	
1	Main Gate	X	Х		33	East Aisle, W34/36	X	X	
2	Main Gate	X	Х		34	M&R Wash Rack, West	Х	х	
3	Truck Queue Entrance	X	Х	Х	35	M&R Wash Rack, East	Х	Х	
4	G.H. Parking	х	X		36	M&R, East	х	х	
5	G.H. Parking	Х	Χ		37	M&R, East	Х	Х	
6	W-23	Х	Х		38	M&R, East	Х	X	
7	West Aisle, W03/05	X	Х		39	U-Row, West	Х	Х	
8	ILWU Parking	X	Х		40	U-Row, East	Х	Х	
9	ILWU Parking	X	Х		41	V-Row	Х	Х	
10	Truck Staging	Х	Х		42	X02-Row	Х	Х	
11	G.H. Parking	х	Х		43	X01-Row	Х	Х	
12	G.H. Parking	х	Х		44	X03-Row	Х	Х	
13	W-11/13 West	х	Х		45	X02/X03, South	х	Х	
14	UTR parking	Х	Х	Х		X01/X02, South	Х	Х	
15	Main Aisle, W24/26	х	х		735°	B-142/Water St. Aisle	Х	X	
16	Main Aisle, W18/20	х	х		MEV.	B-142/B&C Row	Х	Х	
	Main Aisle, W14/16	Х	х			B-143/B&C Row	Х	X	
965	Main Aisle, W08/10	Х	х		SER!	B-143/B&C Row	X	х	
Siziar Miles	Main Aisie, W04/06	х	х						
(ME) 2	W28/30, West	X	x		2375,360	B-143/A&B Row	X	X	
70					30.	B-144/B&C Row	Х	Х	
2	W28/30, East	X	X	100	53	B-144/A&B Row	_X	X	
22	W30/60, West	X	X		54	B-145/A Row, West	Х	Х	
1825	W30/60, Mid	Х	X	1	55	B-145/B&C Row	Х	Х	
24	W30/60, East	Х	X		56	B-146/A Row, West	Х	Х	
25	Mid Aisle, W56/58, West	Х	Х		57	B-146/B&C Row	Х	Х	
BROOK.	Mid Aisle, W50/52, West	х	X		58	B-146/A Row-Y04	Х	Х	
27	Mid Aisle, W46/48, West	х	X		59	B-146/B&C Row	Х	Х	
28 N	/lid Aisle, W38/40, West	х	Х		60	Y12/14	х	х	
29 N	/lid Aisle, W34/36, West	х	х		64	/10/12, South	х	X	
	V56/58, East	х	х	1	62	/28, South	Х	Х	
31 E	ast Aisle, W50/52	Х	Х	X	63	/28, North	Х	X	
32 E	ast Aisle, W38/40	х	Х		64	(99	Х	Х	
製		1			65	LWU Parking, Water St.	х	X	

6.2 Annual Compliance Audit

An annual comprehensive site compliance inspection and audit will be conducted by the Storm Water Pollution Prevention Team to verify that all information contained in the Storm Water Pollution Prevention Plan concerning the facility and its operations are accurate and that all elements of the plan are being implemented in accordance with the General Storm Water Permit. The Team shall consult with any other individuals who have responsibilities associated with the Plan in order to ensure that all information regarding storm water management at the facility is considered.

The annual audit will be conducted in June of each year in conjunction with the preparation of the annua regulatory report.

The annual comprehensive compliance audit will include the following:

- A review of all visual observation, inspection, and sampling records;
- A review of all potential pollution sources for evidence of, or the potential for pollutants entering the storm drain system;
- An inspection and evaluation of all BMP's, both non-structural and structural, to determine whether they are adequate and properly implemented, or whether additional BMP's are needed; and
- An inspection of all equipment needed to implement the Plan and an evaluation as to its condition and need for replacement.

The Storm Water Pollution Prevention Team shall revise the Plan or Program, as necessary, within 90 days of the annual audit.

The results of the annual audit will be recorded on blank forms. Copies of the completed annual audit form will be retained. These forms constitute the written audit report, and include the following:

- Personnel performing the audit;
- Dates of the audit;
- □ The scope and results of the audit;
- Any incidents of non-compliance and corrective action taken;
- Necessary Storm Water Pollution Prevention Plan revisions;
- A schedule for implementing any revisions; and
- □ A certification that the facility is in compliance with the California General Industrial Storm Water Permit.

6.3 Storm Water Pollution Prevention Plan Amendments

This Plan shall be amended and the revisions implemented prior to any of the following conditions:

- A change in construction, operation, or maintenance which may significantly increase the quantities of pollutants in storm water discharge;
- A change in construction, operation, or maintenance which causes a new area of industrial activity at the facility to be exposed to storm water;
- □ A change in construction, operation, or maintenance introduces an activity which introduces a new pollutant source at the facility; or
- Whenever this Plan has not achieved the general objectives of controlling pollutants in storm water discharges, pursuant to the requirements of the General Storm Water Permit.

The Storm Water Pollution Prevention Program is evaluated on a yearly basis at the time of preparatio of the annual report. This evaluation consists of two parts, the annual facility inspection and the completion of the Storm Water Monitoring Program quality control checklist. The annual facility evaluation will identify changes in facility operations that could impact storm water and will determine whether the existing storm water management practices are effective. If it is determined that significant changes in operations have occurred or if additional storm water management controls are needed, this plan will be amended accordingly.

The quality control checklist will identify whether all of the elements of the Program are being properly carried out. If it is determined that a particular element of the Program cannot be properly carried ou because of a problem with the methods or procedures described in the program, the program will be amended to abate the problem. Amendments will be documented, with inclusion of change incorporated in the Plan. Completed amendment documentation will also be retained. Amended pages of the plar will be marked as such, with the amendment date provided. Care will be taken when amending the plar and program to ensure that the amendments conform to the conditions of the General Storm Water Permit.

7.0 STORM WATER MONITORING PROGRAM

7.1 Introduction

The objectives of the Storm Water Monitoring Program are:

- Ensure that storm water discharges are in compliance with the discharge requirements, and limitations specified in the General Storm Water Permit;
- Ensure practices at the facility to control pollutants in storm water discharges are evaluated and revised to meet changing conditions;
- Aid in the implementation and revision of the Storm Water Pollution Prevention Plan.
- Measure the effectiveness of BMP's in preventing or reducing pollutants in storm water discharge and authorized non-storm water discharges.

The Storm Water Monitoring Program addresses the following specific requirements:

- Annual Comprehensive Storm Water Site Compliance Audit
- Quarterly Non-Storm Water and Drainage Area Visual Observations
- □ Wet Season Storm Water (October May) Visual Observations
- Sampling and Analysis

7.2 Rationale for Selection of Monitoring Methods

The monitoring methods used for the annual site compliance audits, storm water and non-storm water and drainage area visual observations, and storm water sampling and analyses, were selected to provide all necessary and required information with the least disruption to facility operations. The methods were developed with the knowledge that facility personnel will have to respond in a rapid manner when a rainfall event begins in order to meet the various time constraints for storm water visual observations and storm water sampling and analyses. Visual observations will be utilized to conduct the storm water and non-storm water observations. Specific visual observation locations were selected based upon their cessibility, the type and size of the industrial area tributary to the location, and the potential pollutants at may be present in storm water at that location. In general, observation locations are catch basins, trench drains or slotted drains that collect runoff from large areas of the facility, authorized non-storm

water discharges or from areas that have a potential to contribute significant quantities of pollutants to storm water. On dry days, visual observations will allow for the easy detection of non-storm water discharges. During periods of rainstorms, visual observations will provide a quick, cost effective technique for gathering general information on the quality of storm water being discharged from the facility.

The analytical methods that will be used to analyze storm water samples collected from the facility were selected based upon a review of the potential pollutants that may be present in the runoff from the facility. The analytical methods to be used are required by the General Storm Water Permit. However, additional analysis may be utilized due to the wide range of cargoes that pass through the terminal. Any additional analysis will look for total recoverable petroleum hydrocarbons, volatile organic compounds, and heavy metals. Hydrocarbons may be present as a result of leaks from the large number of trucks that pass through the facility or as a result of spills or leaks from maintenance activities. Volatile organics may also be present as a result of leaks or spills from maintenance activities, and heavy metals may be present as a result of leaks from maintenance and/or vehicle waste oil containers.

7.3 Annual Comprehensive Site Audit Compliance

(See Section 6.2)

7.4 Non-Storm Water and Drainage Area Visual Observations

Visual inspections for the presence of non-storm water discharges and drainage areas will be performed on a quarterly basis on dry days. Identification of the storm water collection areas shows the drainage system, and discharge locations at the facility. Because the actual storm water discharge outfall locations at the facility are not visible, and cannot be observed directly, observations will be made at various storm water collection points at the facility.

The observer will best determine at each observation point whether or not any of the following are present at the facility:

- Unauthorized non-storm water discharges or releases
- Authorized non-storm water discharges or releases
- Stains or discolorations
- Oil or oily sheens
- Sludge
- Odors
- Suspended material or other abnormal conditions.

After making observations at an inspection locations, the observer will record the results on a Quarterly Non-Storm Water and Drainage Area Visual Observation Form. Completed forms will also be retained. Additionally, any areas of the facility where standing water is present will be inspected. If standing water is observed, the source of this water shall be determined, if possible. After an observation is completed at a particular location, the observer shall check off this location on the Quarterly Non-Storm Water and Drainage Area Visual Observation Form.

7.5 Storm Water Visual Observations

in most representation of the first hour of the storm water discharge occurs during the first hour of the storm event on a monthly basis when a significant storm water discharge occurs during the wet season (October 1 through May 30). A significant storm water discharge is defined as a continuous

discharge of storm water for a minimum of one hour. The facility must perform storm water observations only if significant discharges commence during scheduled facility operating hours or within 2 hours after scheduled facility operating hours. Visual observations are required only during daylight hours. If the acility is unable to perform visual observations because of adverse climatic conditions, or due to storms occurring after the time period described above, documentation will be prepared noting an explanation for not performing the observations and will be maintained for review by the Regional Water Quality Control Board.

The person conducting the monthly storm water discharge visual observations shall visually observe storm water runoff at the locations identified as wet season observation locations. During each observation the observer will look carefully to determine whether any of the following are present in the storm water discharge:

- Floating or suspended solids
- □ Oil or grease
- Discoloration
- Odor
- Other abnormal conditions

The observer will document the observations made at each observation location on a Storm Water Discharge Visual Observation Form. Completed forms will also be retained. After an observation is completed at a particular location, the observer will check off the location on the Storm Water Discharge Visual Observation Form. If no observations of storm water discharges are conducted for the required monthly time period due to drought, no significant storm events or other exceptions, an explanation will be recorded on the Storm Water Discharge Visual Observation Form.

7.6 Storm Water Sampling and Analyses

This portion of the monitoring program is designed to collect information regarding potential pollutants in the facility's storm water discharge. To obtain this information, storm water samples will be collected during the wet season.

7.6.1 Parameters of Concern and Analytical Methods

The following table lists the parameters for which storm water discharges from the facility are monitored. The parameters selected are those parameters that are likely to be present in storm water discharge in significant quantities. The table also lists the analytical method by which the sample is to be analyzed, as specified in 40 CFR Part 136, and the preservation method by which the sample is to be preserved from the time of collection to the time of analysis, as specified in Standard Methods for the Examination of Water and Wastewater.

If a particular toxic chemical or pollution is not detected in a significant quantity in samples collected after two consecutive sampling events, then the facility may eliminate analysis or reduce sampling frequency for that toxic chemical or pollutant from future sampling events upon approval by the local storm water regulatory agency. A certification to the agency may be required.

Parameters Of Concern And Associated Analytical And Preservation Methods

Parameter	Analytical Method	Detection Limit	Preservation Method and Required Sample Volume
pH	EPA 150.1		100 ml in polyethylene or glass container
Total Suspended Solids (TSS)	EPA 160.2		500 ml in polyethylene or glass container; Cool to 4°C Hold time: 7 days
Specific Conductance	EPA 120.1		500 ml in polyethylene or glass container; Cool to 4°C Hold time: 28 days
Oil and Grease	EPA 413.1		Two 1-liter glass containers; Cool to 4°C H ₂ SO ₄ to pH<2 Hold time: 28 days
Heavy Metals	EPA 6010/7000 Series Combination		One 1-liter polyethylene; Cool to 4°C HNO ₃ to pH<2 Hold time: 180 days for all metals on list except mercury which has a hold time of 28 days
Total Recoverable Petroleum Hydrocarbons	EPA 418.1		Two 1-liter glass containers; Cool to 4°C H ₂ SO ₄ to pH<2 Hold time: 28 days

7.6.2 Monitoring Frequency

Samples will be collected during the first hour of discharge from the first storm event of the wet season (October 1 through May 30) and at least one other storm event of the wet season that produces significant storm water discharge and that are preceded by at least 72 hours of dry weather, during normal operating hours. Grab samples will be collected within the first hour of a storm water discharge. If a sample is not collected from the first storm event of the wet season, samples will be collected from two other storm events, with an explanation for not sampling the first event will be explained in the annual report.

The facility must collect samples only if significant discharges commence during scheduled facility operating hours or within 2 hours after scheduled facility operating hours. When it is not possible to collect any of the required samples due to prevailing weather conditions or when storm water discharges begin after scheduled facility operating hours, a documented explanation will be prepared as to why the samples could not be collected and will be made available to the Regional Water Quality Control Board.

7.6.3 Sampling Locations

Samples will be collected at the listed locations. Storm water discharged at this point is comprised of runoff from all of the different operational areas of the facility. For this reason, the storm water discharged at this point will be similar to and representative of, all of the other discharge points at the facility. In addition, it is expected that the greatest volume of storm water will be discharged through the selected points.

7.6.4 Sampling Methods

Samples of the storm water discharge will be collected manually either by trained facility personnel, or by a qualified sampling vendor.

For each sampling event, a grab sample will be collected within the first 60 minutes of discharge. If the collection of this sample during the first 60 minutes is impractical, the sample must be collected as soon as possible thereafter. The Annual Monitoring Report will include an explanation of why the sample could not be collected in the first 60 minutes.

Samples will be collected by either placing a bailer or other similar collection device into or near the drait structure, and allowing it to fill with water. Samples will be immediately transferred from the bailer to appropriate sample holding containers, and will be sealed and labeled. They will be held in storage awaiting pick up by the sample transporter. Samples will be relinquished to the transporter under a documented chain-of-custody, and transported to a laboratory certified for analysis.

7.7 Sampling Quality Control Program

The sampling quality control program is designed to confirm that all storm water sampling is conducted in a proper manner. The program consists of:

- □ Sample Tracking Form
- □ Sample labeling requirements
- Sampling Quality Control Checklist

7.7.1 Sample Tracking Form

For each sample, the following information is recorded on the Sample Tracking Form

- □ the date, exact place, and time of the sampling, observation, and/or measurement
- the individual(s) who performed the sampling, observation, and/or measurement
- standard observations (i.e. visual observations, odors, etc).

Completed Sample Tracking Forms are attached to the associated Sampling Quality Control Checklist and retained as part of the Monitoring Program. In addition, a copy of the chain-of-custody form used to transmit the sample to the laboratory will be attached to the Quality Control checklist.

7.7.2 Sample Labeling Requirements

Each collected sample will be labeled with the following information:

- Facility name and address
- □ Field I.D. number
- Collection date and time
- Collection location
- Collector name
- Preservation.

7.7.3 Sampling Quality Control Checklist

The purpose of the sampling Quality Control checklist is to ensure that all samples are collected and handled according to appropriate procedures and that all necessary information is recorded for each sample. Following completion of every round of storm water sampling, the checklist should be completed. The checklist is intended to verify the following:

- Samples were collected using the proper containers.
- □ Sample labels were properly completed.
- Samples were properly preserved.
- □ Proper chain-of-custody procedures were followed.
- □ Sample tracking forms were properly completed.

8.0 Storm Water Pollution Prevention Plan (SWPPP) Action Plan Summary

- Form SWPPP Action Team
- Train and inform team members and others
- □ Identify materials, chemicals, and conditions noting potential pollutant sources
- Create corresponding Best Management Practices (BMP) for identified sources to avert pollution
- Maintain preparation for emergency spill response
- □ Conduct instant, monthly, quarterly, and annual inspections and audits
- Maintain documented evidence of actions taken for ready reference and compliance confirmation
- Maintain alertness of actual conditions to effect innovative and improved address to any given pollution issue

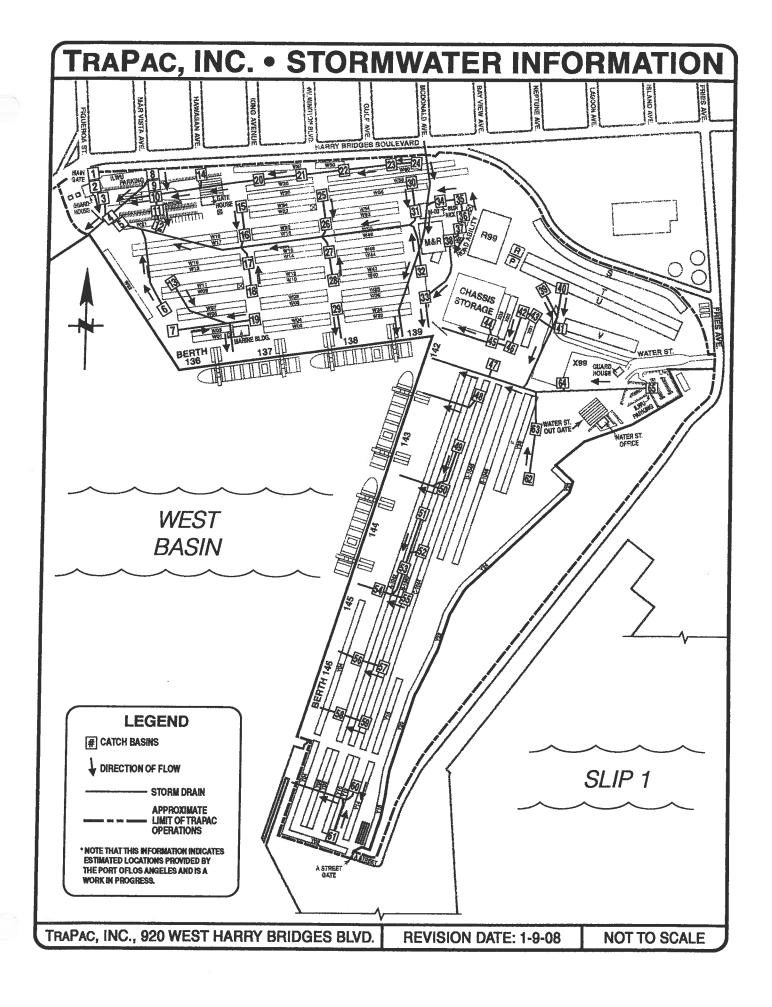












SWPPP ANNUAL TRAINING DOCUMENTATION

NAME:		TITLE:	DATE:	
	(Print)			
I certify that I have	read and understand the	following and annual and a		
1 certify that I have I	icad and understand me	following program contents	and the application of each:	
•	SWPPP			
		ncy Plan (ECP). Relative to H	Hazardous Materials & Hazardous	Waste
•	California General Sto	orm Water Permit (Summary	thereof)	· · · · · · · ·
In addition, the facil	ity storm water pollution	n nersonnel have explained r	my responsibilities under the Storm	. Water
Management Program	n guidelines. And, I un	derstand and am prepared to	execute the responsibilities outline	ı waleı ed
below.				, ,
	_			
RESPONSIBILITIES	S:			
200				
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GNATURE:		\$1	100	
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STORM WATER SAMPLING QA/QC CHECKLIST

STORM WATER SAMPLING QUALITY ASSURANCE/QUALITY CONTROL CHECKLIST

Name of Sampler:		Date:	Time:
(Print)			
Were samples collected in the proper of all sample containers and equipment containers.	container lean.	s as described in the	e attached table and were
2. For each sample collected: Was the fol	llowing in	formation recorded	on the label:
· the facility name and address	yes	no	
· collection date and time	yes	no	
- collection location	yes	no	
· collector name	yes	no	*
· preservation	yes r	10	
3. Was the sample collected and preserved in yes no	accorda	nce with the require	ments in the attached table?
Was the sample sent under chain-of-custor accredited and state approved laborator yes no	dy docum y for the	nentation to a state- analyses to be perf	certified or otherwise crmed?
For each sample collected, attach a completed	Sample	Tracking Form and	Chain-of-Custody Form to the

STORM WATER SAMPLE TRACKING FORM

(Or Utilize Chain-of-Custody Form)

Date Report Form Prepared:		
Name of Sampler:	(Print)	
Type of Sample: Grab _		
Type of Gample. Grab_	Composite	
Date of sample collection:	Time of sample collection:	a.m. p.m.
Grab samples must be collected discharge, explain why	during the first hour of discharge. If the sample was	s not collected during the first hour of
		1
Location of sample collection:		
	ations made at time of sampling such as turbidity, o	dor, oil sheen or discoloration:
		· · · · · · · · · · · · · · · · · · ·
lame of laboratory to be used for s	sample analyses:	

NON-STORM WATER AND DRAINAGE AREA VISUAL OBSERVATIONS RECORD

Must Bé Completed Quarterly During the Following Periods
1. July – September

- 2. October December
- 3. January March
- 4. April June

Dat	te:Time:
Insp	spector's Name: Title: Title:
	ions:
1.	Complete check list on the following pages by checking off each location as it is and by checking off unusual conditions that are observed.
2.	
۷.	Explain any flows, stains, sludges, odors, or other abnormal conditions that we
۷.	Explain any flows, stains, sludges, odors, or other abnormal conditions that we
Ζ.	
۷.	
2.	

NON-STORM WATER AND DRAINAGE AREA VISUAL OBSERVATION FORM

Must Be Completed Quarterly

Part 2

No.	Observation Location (See figure on next page)	Obse Comp	rvation oleted	Flows/Abnormal Conditions/ Stains/Odors/Sludges/ Oily Sheens/Discolorations	Other Observations
	F-9-/	Υ	N		
$-\parallel$					
$\neg \dagger$					
-				\$a	
_					
omme	ents				
¥3	· · · · · · · · · · · · · · · · · · ·				

RECORD OF CONTAINMENT AREA DRAINAGE EVENTS

Instructions: Completed whenever storm water or other materials are drained or pumped from a diked or bermed area.

Diked or bermed area	Date	Material Drained (storm water, spilled oil, etc.)	Presence of oil, oily sheen, chemicals, odors, solids, etc.	Time Started	Time Finished	Disposition of drained or pumped water or materials	Signature
·							

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MONTHLY STORM WATER DISCHARGE VISUAL OBSERVATIONS

Must be Completed at Least Once per Month During Storm Events During October through May (observations must be performed during the first hour of the monthly storm event)

Part 1 Observation for Month of:	Date:
	Observation Time:
Name of Inspector:	
OBSERVATIONS	
 Complete the checklist on following checking off any unusual condition 	ng page by checking off each location as it is observed and by ns that are observed.
discharges, or odors	solids, oil and grease or floating sheens, discolored or turbid
····	
3. Any other observations?	res no
If yes, identify and explain	
4. If no observation for month, state re	ason

STORM WATER DISCHARGE VISUAL OBSERVATION FORM

Must be Completed During the First Hour of Rainfall at Least Once per Month During Storm Events During October through May

Part 2

			Observation Completed		
No.	Catch Basin/Slotted Drain/Collection Area	Y	N (W/Reason)	Flow/Abnormal Cond./Stains/Odors/Sludges/Oily Scheens/Discolorations	Other Observations
1	Main Gate				
2	Main Gate				
3	Truck Queue Entrance				
4	G.H. Parking				
5	G.H. Parking				
6	W-23				
7	West Aisle, W03/05				
8	ILWU Parking				
9	ILWU Parking				
10	Truck Staging				
11	G.H. Parking				
12	G.H. Parking				
13	W-11/13 West				
14	UTR parking				
15	Main Aisle, W24/26				
16	Main Aisle, W18/20				
17	Main Aisle, W14/16				
18	Main Aisle, W08/10				
19	Main Aisle, W04/06				
20	W28/30, West				
21	W28/30, East				
22	W30/60, West				
23	W30/60, Mid				
24	W30/60, East				
25	Mid Aisle, W56/58, West				
26	Mid Aisle, W50/52, West				
27	Mid Aisle, W46/48, West				
	Mid Aisle, W38/40, West				

<u> </u>		—		<u> </u>
32	East Aisle, W38/40			
33	East Aisle, W34/36			
34	M&R Wash Rack, West			
35	M&R Wash Rack, East			
36	M&R, East			
37	M&R, East			
38	M&R, East			
39	U-Row, West			
40	U-Row, East			
41	V-Row			
42	X02-Row			
43	X01-Row			
44	X03-Row			
45	X02/X03, South			
46	X01/X02, South			
47	B-142/Water St. Aisle			
48	B-142/B&C Row			
49	B-143/B&C Row			
50	B-143/B&C Row			
51	B-143/A&B Row			
52	B-144/B&C Row			
53	B-144/A&B Row			
54	B-145/A Row, West			
55	B-145/B&C Row			
56	B-146/A Row, West			
57	B-146/B&C Row			
58	B-146/A Row-Y04			
59	B-146/B&C Row			
	Y12/14			
61	Y10/12, South			
	Y28, South		7	ρ.
	Y28, North			
64	X99			
	ILWU Parking, Water St.			
dditiona	l Comments:			

QUARTERLY PREVENTIVE MAINTENANCE & EQUIPMENT INSPECTION

Name of In	spector:	Date of Inspection:
	(Print Name)	-
Inspector's	Signature:	
•		
Diese	el Storage Tanks and Dispensing Area:	
	leak detection and high level alarm systems	
	□ hydrocarbon detection/rain diversion system □ □	
	□ □ □ secondary containment and spill pads	
	□ tertiary containment structure	
	interstitial drain valve/fittings	
	•	
	dispensing area and hoses	
0	a tank loading piping and systems	
	_	
	external tank surfaces	
	-	
<u> </u>	• • • • • • • • • • • • • • • • • • • •	
	line Storage Tank and Dispensing Area:	
0		
0	-	
	y a series and trip pair	
٥		
_		
_		
_ _	interstitial drain valve/fitting	
<u> </u>		
	dispensing area and hoses	
	tank loading piping and systems	
	external tank surfaces	
	0	
	general area and tertiary containment structure	
	ous Materials/Waste Storage and Accumulation Areas	
	secondary containment pallets, devices or similar equipmer	nt
0	omdition of startes subjects (if you are 1)	
	condition of storage cabinets (if present)	
Q:	spill absorbant pada Maintananaa Building	
	spill absorbent pads Maintenance Building □	
<u> </u>	leak detection and high level alarm systems	
_		
_	secondary containment	
<u>.</u>		
	interstitial drain valve/fitting	g

□ tank unloading piping and systems

QUARTERLY PREVENTIVE MAINTENANCE & EQUIPMENT INSPECTION

u	
	external tank surfaces
O.	
	general area
Q	inside used oil collection systems (oil carts, hoses, fittings, etc.) .
RTG N	Maintenance/Repair Area & Covered Equipment Storage Area:
0	leak detection and high level alarm systems
	secondary containment
	interstitial drain valve/fittings
	oil hoses and fittings
	tank loading piping and systems
<u> </u>	
	external tank surfaces
0	
	general area
-	
	Container Storage Areas
	Emergency Diesel Generators
	Channella, to the state of the
0	Steam cleaning area and associated oil/water separator
	Air community of Provided Association (1)
0	Air compressors at Power Shop, M&R Chassis Shop
-	Time Manual Course
	Tire Mount Canopy
Preventive Main	famana.
Lieventiae tatam	
	1. Is the integrity of all impervious surfaces intact and in good condition? yes no
	If no, identify the surfaces that need to be repaired
	2. Are all aboveground tank systems (including lines and fittings) intact and in good condition? ves
	<u>no</u>
	If no, identify any tanks or tank fittings with leaks or other problems and the steps taken to repair
	the leak or problem(s)
	3. Are all aboveground tank leak detection and high level alarm systems operating and in good
	working condition? yes no
	If no, identify any malfunctioning and the steps taken to repair or replace the system
	· · · · · · · · · · · · · · · · · · ·

If no, list the devices that are damaged and the steps being taken to repair/replace them.

7. Is all other above-listed equipment and areas (air compressors, emergency generators, steam clean area) in good condition and free of oils, residues or debris? yes no

If no, identify any equipment or areas with leaks or other problems and the steps taken to repair the leak or problem(s).

6. Are all storm water conveyance system devices (i.e. slotted drains, trench drains, etc.) intact and in good

If no, list the containers that are damaged or otherwise improper and the steps being taken

4. Are hazardous materials/wastes stored in appropriate storage areas? yes no If no, move all hazardous materials/wastes to appropriate storage area.

external residues and in good condition? yes no

to repair/replace them or correct the problem.

condition? yes no

5. Are hazardous material/waste storage containers intact, tightly closed, clean and free of

QUARTERLY PREVENTIVE MAINTENANCE & EQUIPMENT INSPECTION

HOUSEKEEPING PRACTICES

 Are the parking areas and roadways kept clean of residues and debris (particularly container storage and reefer storage areas and the Trouble Parking Area)? yes no If no, identify the areas which needs to be cleaned Is all machinery kept clean of debris and oils? yes no If no, identify the machinery that needs to be cleaned Are hazardous material storage areas and outside material loading and unloading areas kept clean of oil, residues and debris? yes no If no, identify the areas which needs to be cleaned Are storm water drainage discharge points kept clean of debris and oils? yes no If no, identify the areas that need to be cleaned
SPILL PREVENTION AND RESPONSE
 Is spill cleanup equipment kept in key locations to expedite spill response? yes no If no, list the equipment to be obtained and the location where it will be stored. If a spill occurred, were the proper reporting and cleanup procedures followed? yes no If no, explain: Has the cause of any spill been determined to attempt to prevent a repeat? yes no If no, evaluate each spill that occurred during the past month and develop a procedure to prevent a recurrence
FOLLOW UP
Have any deficiencies identified during the previous month's inspection been corrected? yes no if no, provide the projected date for corrective action
ADDITIONAL COMMENTS - REMARKS

ANNUAL SITE COMPLIANCE AUDIT
STORM WATER POLLUTION PREVENTION PLAN (use this form as an aid in completing the State report form)

Nam	e of Auditor/Inspector: _	(Print)	Date:
		(Print)	
Date	of Last Audit:	Signature of Audito	r/Inspector:
A.	Potential New Sources information contained in	of Storm Water Pollutants (When the SWPPP with current conditions	answering these questions, compare the at the facility.)
1.	yes no		ty that could impact storm water discharges?
2.			
	Have any new activitie discharges? yes no	s or operations been added to the	facility that could impact storm water
4.	If yes, list the new activ	vities or operations	
5.		storm water discharges	
	discharges? yes no		t the facility that could impact storm water
7.	If yes, list the new poter	ntial pollutants	
8.	Describe the impact on	storm water discharges	
В.	Best Management Pract	ices	
1.			Sections 5.1 and the Summary Assessment of agement Practices in practice and are they
2.	TC . 15.		
3. effe	List any of the BMP's weetiveness	which may be ineffective and the	steps being taken to increase their
4.	Are all storm water cont	rol barriers (i.e., trench drains, sl	otted drains, gutters, etc.) listed intact?

5.	f not, note those missing	
		_
_		

ANNUAL SITE COMPLIANCE AUDIT

ANNUAL INSPECTION OBSERVATION LOCATIONS

Check off individual locations after completing the inspection of the storm water control barrier.

No.	Catch Basin/Slotted Drain/Colle	ction Area
1	Main Gate	Observation Completed YES NO
2	Main Gate	Observation Completed YES NO
3	Truck Queue Entrance	Observation Completed YES NO
4	G.H. Parking	Observation Completed YES NO
5	G.H. Parking	Observation Completed YES NO
. 6	W-23	Observation Completed YES NO
7	West Aisle, W03/05	Observation Completed YES NO
8	ILWU Parking	Observation Completed YES NO
9	ILWU Parking	Observation Completed YES NO
10	Truck Staging	Observation Completed YES NO
11	G.H. Parking	Observation Completed YES NO
12	G.H. Parking	Observation Completed YES NO
13	W-11/13 West	Observation Completed YES NO
14	UTR parking	Observation Completed YES NO
15	Main Aisle, W24/26	Observation Completed YES NO
16	Main Aisle, W18/20	Observation Completed YES NO
17	Main Aisle, W14/16	Observation Completed YES NO
18	Main Aisle, W08/10	Observation Completed YES NO
19	Main Aisle, W04/06	Observation Completed YES NO
20	W28/30, West	Observation Completed YES NO
21	W28/30, East	Observation Completed YES NO
22	W30/60, West	Observation Completed YES NO
23	W30/60, Mid	Observation Completed YES NO
24	W30/60, East	Observation Completed YES NO
25	Mid Aisle, W56/58, West	Observation Completed YES NO
26	Mid Aisle, W50/52, West	Observation Completed YES NO
27	Mid Aisle, W46/48, West	Observation Completed YES NO

29	Mid Aisle, W34/36, West	Observation Completed YES NO
30	W56/58, East	Observation Completed YES NO
31	East Aisle, W50/52	Observation Completed YES NO
32	East Aisle, W38/40	Observation Completed YES NO
33	East Aisle, W34/36	Observation Completed YES NO
34	M&R Wash Rack, West	Observation Completed YES NO
35	M&R Wash Rack, East	Observation Completed YES NO
36	M&R, East	Observation Completed YES NO
37	M&R, East	Observation Completed YES NO
38	M&R, East	Observation Completed YES NO
39	U-Row, West	Observation Completed YES NO
40	U-Row, East	Observation Completed YES NO
41	V-Row	Observation Completed YES NO
42	X02-Row	Observation Completed YES NO
43	X01-Row	Observation Completed YES NO
44	X03-Row	Observation Completed YES NO
45	X02/X03, South	Observation Completed YES NO
46	X01/X02, South	Observation Completed YES NO
47	B-142/Water St. Aisle	Observation Completed YES NO
48	B-142/B&C Row	Observation Completed YES NO
49	B-143/B&C Row	Observation Completed YES NO
50	B-143/B&C Row	Observation Completed YES NO
51	B-143/A&B Row	Observation Completed YES NO
52	B-144/B&C Row	Observation Completed YES NO
53	B-144/A&B Row	Observation Completed YES NO
54	B-145/A Row, West	Observation Completed YES NO
55	B-145/B&C Row	Observation Completed YES NO
56	B-146/A Row, West	Observation Completed YES NO
57	B-146/B&C Row	Observation Completed YES NO
58	B-146/A Row-Y04	Observation Completed YES NO
59	B-146/B&C Row	Observation Completed YES NO
60	Y12/14	Observation Completed YES NO
61	Y10/12, South	Observation Completed YES NO
62	Y28, South	Observation Completed YES NO
63	Y28, North	Observation Completed YES NO
64	X99	Observation Completed YES NO
65	ILWU Parking, Water St.	Observation Completed YES NO

6. List any of the control barriers, which are damaged the steps being taken to repair them:
7. Have any new housekeeping or preventive practices been implemented which could impact storm water discharge yes no
8. If yes, describe the new practices and the impact on the storm water discharges:
C. Effectiveness of Pollutant Reduction Procedures
Describe any spills that occurred since the last inspection that impacted storm water discharges:
 If sampling data has been collected, has the data verified that the storm water pollution prevention plan has achiev its objective of controlling pollutants in the storm water? yes no If not, what changes should be made in the SWPPP so that it achieves its objective?
4. Have the changes described above been implemented? yes no 5. If not, provide the scheduled date of corrective action:
D. Personnel and Record Keeping Requirements
 Have the pollution prevention personnel remained the same? yes no If not, have replacements been appointed? yes no
E Training Requirements
 Have all personnel requiring training under the plan received either initial or refresher training? yes no If not, provide the schedule date(s) of required training:
F Other Requirements 1. Has the SWPPP been amended to reflect the changes that were identified in the previous audit sections? yes no 2. If not, provide the scheduled date of corrective action:
By execution of this document, I hereby certify that the quality control check list has been fully addressed, and that all corrective actions have been effected.

Rev 11/2007

STORM WATER MONITORING PROGRAM QUALITY ASSURANCE/QUALITY CONTROL CHECKLIST

Name of QA/QC Revie	ewer: Date:
Have storm water d previous year or wet se	ischarge visual observations been conducted for each month of the eason as required?
yes no _	
If no, has an appropriat	e explanation of why the observations were not conducted been provided?
Yes no _	
If no, provide the date of	of corrective action:
2. Have the Storm Water appendix of the SWPPF	er Discharge Visual Observation Forms been filed in the appropriate ?
yes no _	
If no, provide the date of	f corrective action:
3. Have non-storm water basis during the previous	r and drainage area visual observations been conducted on a monthly s year?
yes no	
Have the Non-Storm Wa SWPPP?	ter and Drainage Area Visual Observation Forms been filed in the appropriate appendix of the
Yes no	
If no, provide the date of	corrective action:
4. Have two rounds of sto season?	orm water samples been collected during the previous year or wet
yes no	
If no, has an appropriate	explanation been provided?
yes no	
If no, provide the date of o	corrective action:

5. Have Sample Tracking Forms and Sampling QA/QC Checklists been completed for each round of sampling?
yes no
If no, provide the date of corrective action:
Have Sample Tracking Forms and Sampling QA/QC Checklists been filed in the appropriate appendix of the SWMF
Yes no
If no, provide the date of corrective action:
6. Has the annual comprehensive site compliance audit been completed?
Yes no
If no, provide the date of corrective action:
7. Have the SWPPP and SWMP been amended to reflect the changes that were identified in the annual audit?
yes no
If no, provide the date of corrective action:
8. Have all personnel who require training under this plan received either initial or refresher training in the last year?
yes no
If no, provide the date of corrective action:
Have the Training Forms been filed in the appropriate appendix of the SWPPP?
Yes no
If no, provide the date of corrective action:
9. Has the annual report to the appropriate storm water regulatory agency been properly completed and submitted?
yes no
If no, provide the date of corrective action: